

July 3, 2018

Mr. Michael Stoker  
Regional Administrator  
U.S. Environmental Protection Agency  
Region 9  
75 Hawthorne Street  
San Francisco, California 94105

Dear Mr. Stoker:

The California Air Resources Board (CARB) is submitting to the U.S. Environmental Protection Agency (U.S. EPA) the *Imperial County Clean Air Act Section 179B(b) Retrospective Analysis for the 75 ppb 8-Hour Ozone Standard* (Retrospective Analysis). The Retrospective Analysis demonstrates that Imperial County would have attained the 75 parts per billion (ppb) 8-hour ozone National Ambient Air Quality Standard (NAAQS or standard) by the July 20, 2018 attainment deadline. The Retrospective Analysis allows U.S. EPA to waive the requirement to reclassify Imperial County from Moderate to Serious attainment.

On June 3, 2016, U.S. EPA classified Imperial County as a Moderate nonattainment area for the 75 ppb 8-hour ozone standard. Despite air quality progress in the region, Imperial County did not meet the July 20, 2018 attainment deadline. Although the more northern areas of Imperial County consistently record values well below the NAAQS, areas near California's international border with Mexico continue to exceed the 75 ppb 8-hour ozone standard.

The federal Clean Air Act (Act) includes a provision under section 179B that allows consideration of the impacts of transport of pollutants across international borders. Specifically, section 179B (b) of the Act waives the requirement of reclassification to the next higher classification upon failure to attain the NAAQS, if it is shown that an area would have met attainment but for emissions emanating from outside of the United States. Because of the timing of the ozone season in relation to the attainment date, Moderate attainment areas were required to demonstrate attainment using 2017 air quality data. In the Retrospective Analysis, CARB staff concludes that the 8-hour ozone design values at each station in Imperial County would have been below the 75 ppb 8-hour ozone standard in 2017, and that Imperial County would have attained the 75 ppb 8-hour ozone standard by the attainment date of July 20, 2018, had the impacts of emissions emanating from Mexico not been present.

Mr. Michael Stoker  
July 3, 2018  
Page 2

If you have any questions, please contact Mr. Kurt Karperos, Deputy Executive Officer at (916) 322-2739, or Dr. Michael Benjamin, Chief, Air Quality Planning and Science Division, at (916) 201-8968.

Sincerely,



Richard W. Corey  
Executive Officer

Enclosure

cc: Mr. Matt Dessert  
Air Pollution Control Officer  
Imperial County Air Pollution Control District  
150 S. 9th Street  
El Centro, CA 92243-2839

Mr. Kurt Karperos  
Deputy Executive Officer  
California Air Resources Board

Dr. Michael Benjamin, Chief  
Air Quality Planning and Science Division  
California Air Resources Board

Mr. Michael Stoker  
July 3, 2018  
Page 3

bcc: (External, via email with enclosure)

Laura Lawrence  
U.S. Environmental Protection Agency  
Region 9  
([Lawrence.Laura@epa.gov](mailto:Lawrence.Laura@epa.gov))

Rory Mays  
U.S. Environmental Protection Agency  
Region 9  
([Mays.Rory@epa.gov](mailto:Mays.Rory@epa.gov))

Reyes Romero  
Imperial County Air Pollution Control District  
([reyesromero@co.imperial.ca.us](mailto:reyesromero@co.imperial.ca.us))

Monica Soucier  
Imperial County Air Pollution Control District  
([monicasoucier@co.imperial.ca.us](mailto:monicasoucier@co.imperial.ca.us))

bcc: (Internal, via email with enclosure)

Craig Segall, LO  
Sylvia Vanderspek, AQPSD  
Carol Sutkus, AQPSD  
Webster Tasat, AQPSD  
Ariel Fideldy, AQPSD

Hard copies: with enclosures below

EO Chron  
AQPSD Chron  
SIP Library

Assignment: AQPSD #10276 / CARB #20574

Letter:

X:\2016 Ozone SIPs\Imperial SIP (Bump-up)\179B(b) Demonstration\Sharepoint\  
Imperial Ozone 179B(b) Submittal Letter to US EPA.docx

Mr. Michael Stoker  
July 3, 2018  
Page 4

Report:  
X:\2016 Ozone SIPs\Imperial SIP (Bump-up)\179B(b) Demonstration\Sharepoint\  
Imperial Ozone 179B(b) Staff Report FINAL.pdf